

U.S. Dist. Court  
District of New Jersey

Jasper Frazier } Jury Trial  Yes  No  
Plaintiffs } Civil Action.  
- Against -

Commissioner Victoria L. Kuhn  
Commissioner Robert E. Carter  
S.W.S.P. Asst. Supt. Anthony Deguer  
S.W.S.P. Asst. Admin. AL Solanik  
S.W.S.P. Chaplain Phillip Herden  
D.S.P./E.J.S.P. Admin. Patrick Mogan  
D.S.P. Chaplain "John Doe"  
E.J.S.P. Chaplain W. Pidgeon  
Interstate Compact Donna Sweeney  
I.D.O.C. Interstate Compact Joel Gruber  
I.D.O.C. Chief Counsel Bob Bugher  
I.D.O.C. ATG. Mongo Tucker  
The Geo Group Classification Glenda Cecil  
The Geo Group Unit Team Manager Shave Nelson  
The Geo Group Casemanager Jama Jones

Attorney Jessica Wegg  
Attorney Charles Little  
Defendant's

I. Parties in this complaint

1. Plaintiff: Jasper L. Frazier  
Street Address: East Jersey State Prison  
1100 Wood Bridge Rd; Lock Bag R  
County, City: Middlesex RAYWAY  
STATE and zipcode: New Jersey 07065  
Telephone number: (732)-499-5010

B.

2. Defendant No. 1 Name: Commissioner  
Victoria L. Kuhn  
Street Address: STATE of New Jersey  
Dept. of Corrections Whittlesey Road  
P.O. Box 863  
County, City Mercer; Trenton  
State and zipcode New Jersey 08625-0863

3. Defendant No. 2. Name: Commissioner Robert E. Carter  
Street Address: 302 West Washington Street I.G.C.S.  
County, City: Marion; Indiana  
State and zipcode: Indiana 46204
4. Defendant No. 3. Name: Southwood State Prison Asst. Supt. Anthony Degner  
Street Address: 215 South Burlington Rd  
County, City: Cumberland; Bridgeton  
State and zipcode: New Jersey 08302
5. Defendant No. 4 Name: Southwood State Prison Asst. Admin. AL Solanik  
Street Address: 215 South Burlington Rd  
County, City: Cumberland; Bridgeton  
State and zipcode New Jersey 08302
6. Defendant No. 5. Name: Southwood State Prison Chaplain Phillip Harden  
Street Address: 215 South Burlington Rd

County, City: Cumberland ; Bridgeton  
State and zip code: New Jersey 08302

7. Defendant No. 6. Administrator  
Patrick Hogan

Street Address: East Jersey State Prison  
1100 Woodbridge Rd ; Lock Bag R

County, City: Middlesex RAYWAY  
State and zipcode: New Jersey 07065

8. Defendant No. 7. Name: Northern  
State Prison Chaplain John Doe

Street Address: 215 South Burlington Rd

County, City: Essex Newark

State and zipcode: New Jersey 07114-2300

9. Defendant No. 8 Name: Chaplain W. Pidgeon  
Street: East Jersey State Prison 1100

woodbridge Rd; lock Bag R

County, City: middlesex RAYWAY

State and zipcode: New Jersey 07065

10. Defendant No. 9. NAME: Interstate Compact Donna Sweeney  
Street ADDRESS: State of New Jersey Department of Corrections Whittlesey Rd. P.O. Box. 863 County, City: Mercer Trenton State and Zip code: New Jersey 08625 -0863
11. Defendant No. 10. NAME: I. D. O. C.  
Interstate Compact Joel Gruber  
Street Address: Indiana Department of Corrections 302 west Washington Street - Rm. E334  
County; City: Marion; Indianapolis  
State and Zip code: Indiana, 46204
12. Defendant no. 11; 12 NAME: I. D. O. C.  
Chief Counsel Bob Bugher; Atg. Mago Tucker  
Street Address: E334 I. G. C.S.  
302 west Washington Street  
County; City; Marion; Indianapolis  
State And zipcode: Indiana, 46204

13. Defendant's No. 13, 14, and 15.

NAMES: Classification Glenda-Cecil, Unit Team manager - Shave Nelson and case manager-Jama Jones

Street Address: The GEO Group Private Prison New Castle Correctional Facility 1000 Van Nuys Rd.

County; City; Henry; New Castle State; and zip code; Indiana 47362

14. Defendant's No. 16 AND 17. NAMES:

Saeed and Little law Firm (Attorney Jessica Wegg and Attorney Charles Little)

Street Address: 189-133 West Market Street

County; City; Marion; Indianapolis State; and zip code; Indiana 46204

15. II. Basis for Jurisdiction

A. what is the basis for Federal court jurisdiction? (check all that apply)

- Federal Question       Diversity of Citizenship  
 U.S. Government Defendant       U.S. Government - Plaintiff

B. If the basis for jurisdiction is Federal Question, what Federal Constitutional, statutory or treaty right is at issue?

16. Defendant No. 1. Commissioner Robert E Carter violated Plaintiff First Amendment Freedom of Expression, Freedom of Religion under Religious Land USE and Institutionalized Person Act (R.L.U.I.P.A.) by moving Plaintiff to New Jersey Department of Corrections

In (4) civil lawsuit Plaintiff  
settle with Commissioner Office  
and State of Indiana. Plaintiff been  
denied to practice his religion  
"M.S.T.A." (Moorish Science Temple  
of America), Denied Access to a  
Religious Adviser Grand Shiek for  
Moorish Science Temple of America at  
Southwood State Prison - northern  
State Prison- East Jersey State Prison.

, Denied to order Moorish Science  
Temple of America Necklace, Fez  
or any Moorish Science Temple of  
America religious Artifacts And  
Denied to hold Moorish Science  
Temple of America Religious Services .

17. Defendant No. 1 Commissioner Robert E Carter violated Plaintiff  
Fourteenth Amendment Denied  
equal treatment to practice  
his religion Moorish Science  
Temple of America inmates similar-

situated like Plaintiff under I.G.C.

18. Defendant No. 2 Commissioner Victoria L. Kuhn violated Plaintiff First Amendment freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) by not implement policy to New Jersey Department of Corrections to place Moorish Science Temple of America on approve list for religion, order Religious Artifacts "Books, Necklace, fez etc.", Denied Access to Religious Advisor Grand Shiek for Moorish Science Temple of America at South Wood State Prison, Northern State Prison (R.H.U.) and East Jersey State Prison, and Denied to implement into Policy for New Jersey Dept. of Correction to hold religious service for Moorish Science Temple of America.

19. Defendant's No. 3, 4, 5. S.W.S.P.  
Asst. Supt. Anthony Degner, Asst. Admin.  
AL Solonik and S.W.S.P. Chaplain  
Phillip Horden violated Plaintiff First  
Amendment: freedom of SPEECH,  
freedom of Expression, freedom of  
religion under Religious Land Use  
and Institutionalized PERSON Act  
(R.L.U.I. P.A.) denying Plaintiff  
to practice Moorish Science Temple of  
America religion deem a religion  
in 7<sup>th</sup> District Court in Indiana,  
Illinois, Wisconsin, New York, Pa  
etc...., Denied Access to Religious  
Advisor Grand Shiek for moorish  
Science Temple of America at S.W.S.P.  
And Denied to order religious  
Artifacts "Books, Necklace, Fez etc."  
And retaliation for Freedom of Speech.

20. Defendants' No. 3, 4, and 5. S.W.S.P.  
Asst. Supt. Anthony Degner, Asst.-  
Admin. AL solonik And S.W.S.P.-

Chaplain Phillip Harden Violated Plaintiff Fourteenth Amendment: Denied equal protection of the law to practice Moorish Science Temple of America religion inmates similar situated like Plaintiff get to practice there religion of choice at Southwood State Prison.

21. Defendants No. 6 and 7 Administrator Patrick Nogen and Chaplain John-Doe at northern state prison violated Plaintiff First Amendment: Freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.), Denying Plaintiff Religious Advisor "Grandshiek" for Moorish Science Temple of America in Restricted housing Unit, while other religion Advisor was allowed to see other inmates and retaliation for -

Freedom of speech.

22. Defendants No. 6 and 7 Administrator Patrick Nogon and Chaplain "John Doe" at Northern State Prison violated Plaintiff Fourteenth Amendment: Denied Equal Protection of law to practice Moorish Temple of America religion inmates similar situated like Plaintiff get to practice there religion of choice at Northern State Prison

23. Defendants No. 6 AND 8. Administrator Patrick Nogon and Chaplain W. Pidgeon violated Plaintiff First Amendment: freedom of speech, freedom of Expression, freedom of religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) Denying Plaintiff to practice his religion Moorish Science Temple of America deemed a-

religion under 7<sup>th</sup> District Federal Courts (Indiana, Illinois, Wisconsin); New York, Pa, D.C. Va etc., Denied Access to religious Advisor Grand Shiek for Moorish Science Temple of America, Denied to purchase religion Artifacts " Fez, Necklace, Books etc.", And Denied to hold Moorish Science Temple of America Religion Service- And retaliation for freedom of speech.

24. Defendant's No. 6 and 8 Administrator Patrick Mason and Chaplain W. - Pidgeon violated Plaintiff Farkeenah Moudawat: Denied equal protection of the law to Practice Moorish Science Temple of America inmates similar situated like Plaintiff get to practice there religion of choice at East Jersey State Prison.

25. Defendant No. 9 Interstate Compact  
Donna Sweeney Violated Plaintiff  
First Amendment: Denying Plaintiff  
Freedom of Religion under Religious  
Land Use and Institutionalized  
Person Act (R.L.U.I.P.A.), failure  
to Accommodate Plaintiff Religion  
Moorish Science Temple of America  
before arriving to New Jersey Dept.  
of Correction as a interstate compact  
Inmate, failure to Analyze Plaintiff  
Religion before arriving within  
New Jersey Department of Correction  
(S.W.S.P. - N.S.P. and E.J.S.P.),  
Denied Freedom of Speech, Freedom  
of Expression, Denied Religious  
Advisor Grand Shiek for Moorish-  
Science Temple of America, and  
co-Sign with Indiana Depart-  
ment of Correction AtG. Mayo  
Tucker, Chief Counsel Bob Bugher  
and Joel Gruber to allow Plaintiff-

to be housed within New Jersey Department Corrections knowing he be denied to practice his religion Moorish Science Temple of America.

26. Defendant No. 9. Interstate Compact Donna Sweeney violated Plaintiff Fourteenth Amendment: Denied Equal Protection of the law in practice Moorish Science Temple of America inmates similar situated like Plaintiff within N.J.D.O.C or I.C.C get to practice there own religion.

Defendant's No. 10, 11 and 12. Interstate Compact Joel Gruber, I.D.O.C Chief Counsel Bob Butler And Atg. Margo Tucker Violated Plaintiff First Amendment: Being in concert with N.J.D.O.C. to deny Plaintiff

Freedom of Speech, Freedom of Expression, Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.U.I.P.A.) to practice his religion Moorish Science Temple of America, in concert with N.J.D.O.C. to deny Plaintiff to meet with Religious Clergy Grand Shiek of Moorish Science Temple of America, Deny to correspondence with Grand Shiek as a spiritual Advisor by being in concert with N.J.D.O.C. to prevent this, retaliation for Access to Courts in Indiana and New Jersey for freedom of speech being in concert with N.J.D.O.C. to deny Plaintiff religious artifacts "Fez, Necklace - Studs" and failure to maintain contract Plaintiff sign for settlement (4) lawsuits and/or Breach of contract.

27. Defendants No. 10, 11 and 12 Interstate Compact Joel Gruber, I.D.O.C.

Chief Counsel Bob Bugler and AAG Mayo Tucker violated Plaintiff Eight Amendment: Cruel and Unusual punishment by being in concert with N.J.D.O.C. to shut Plaintiff completely "off" in practice his religion Moorish Science Temple of America, Denied access to a religious Clergy, Moorish Science Temple of America for spiritual advise by being in concert with Private Actors - The Geo Group and State Actors - N.J.D.O.C. to put this in place.

28. Defendants No. 10, 11 and 12. Inter-State Compact Joel Gruber, J.D.O.C. Chief Counsel Bob Bugler and AAG Mayo Tucker violated Plaintiff Fourteenth Amendment: Being in concert with Private Actors (The Geo Group) and (STATE Actors) -

N.J.D.O.C. to deny Plaintiff equal protection of the law to practice his religion Moorish Science Temple of America inmates similar situated like Plaintiff get to practice their own religion within N.J.D.O.C.

29. Defendant's No. 13, 14 and 15. The Geo Group Classification Glenda Cecil, Unit Term Manager Shave Nelson and Case Manager Anna Jones violated Plaintiff First Amendment: By being in concert (Private Actors) with (State-Actors) N.J.D.O.C. to deny Plaintiff Freedom of Religion under Religious Land Use and Institutionalized Person Act (R.L.I.P.A.) by classify Plaintiff to be housed within N.J.D.O.C. shut off to practice his religion Moorish Science Temple of America, Denied.

Access to Religious Clerk Grand  
Shiek "Moorish Science Temple  
of America"; failure to inform  
N.J.D.O.C. About Plaintiff religion  
on purpose before arriving on  
Interstate Compact And combine to  
harass and retaliate with the aid  
and assistance of (State Actors) N.J.D.-  
O.C.

30. Defendants No. 13, 14, and 15. The Geo  
Graph classification Glenda Cecil,  
Unit Team Manager Shave Nelson and  
Case manager Jama Jones violated  
Plaintiff Eight Amendment: Being  
in concert with (State Actors) to  
inflict cruel and unusual punishment  
to deny Plaintiff Access to  
religious clergy Grand Shiek and  
practice his religion Moorish  
Science Temple of America within  
N.J.D.O.C.

31 Defendants No. 13, 14. And 15. The Geo Group classification Glenda Cecily, Unit team Manager Shave Nelson And case manager Jana Jones violated Plaintiff Farzehan Amendmali: Being in concert with State Actors (N. J. D. O. C.) to deny Plaintiff Equal Protection of the law to practice his religion "Moorish Science Temple of America" inmates similar situated like Plaintiff within N. J. D. O. C. get to practice there religion freedom of choice.

32 Defendants No. 16 And 17. Attorney Jessica Wegg And Attorney Charles Little violated Plaintiff First Amendmet: Indiana Professional Rules of Conduct 1. 16 (a) Duty owed to client, by not filing any stipulation to settle (4) civil lawsuit order by Federal 7<sup>th</sup> Dist.

Court Judge Dins more to implement Plaintiff religion of choice Moorish Science Temple of America, Retaliation for Freedom of Speech, failure to hold or maintain Fiduciary Duty to Plaintiff appointed by 7th District Court.

33. Defendants No. 16 and 17. Attorney Jessica Wegg and Attorney Charles Little violated Plaintiff Eight Amendment. Enforcing cruel and unusual punishment with A.G. Mono Tucker, chief counsel Bob Bob Butler And Interstate Compact Joel Gruber to deny Plaintiff Access to religious Clergy within N.J.D.O.C. And practice his religion Moorish Science Temple of America

34 Defendants No. 16 and 17. Attorney Jessica Wegg and Attorney Charles -

Little violated Plaintiff Fourteenth Amendment: Denied equal protection of law, failure to implement to AtG. Mayo Tucker - Chief Counsel Bob Butler - Interstate Compact Joel Gruber And New Jersey Dept. Corrections Donna Sweeney Plaintiff religion as Moorish Science Temple of America inmates similar situated like Plaintiff get to practice there own religion.

35. C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship Under 28 U.S.C. § 1331, a case involving the U.S. Constitution or federal laws or treaties is a federal question case

Defendant(s) state(s) of citizenship - Diversity of Citizenship - Under 28 U.S.C.

331331, a case involving the U.S. Constitution or Federal laws or treaties is a federal question case And Under 28 U.S.C § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000.00.

### 36. III. STATE OF FACTS

37. On or about Feb. 26 2021 - March 1, 2021 10:00 A.m / 1:30 p.m. Plaintiff housed at The Geo Group Private Prison New Castle Correctional Facility.
38. Plaintiff had a settlement conference with I. D. O.C. Chief Counsel Bob Bigler, I. D. O.C. Attorney General Mayo Tucker, Attorney Jessica Wegg appointed by 7th Dist. Court on behalf of Plaintiff and Federal Judge Mark J. Dinsmore.

39. Plaintiff implemented to his Attorney Jessica Wegg in order to resolve the (4) civil lawsuits part of it, Plaintiff would need a (1) man cell, practice his religion Moorish Science Temple of America and no more harassment or retaliation from defendant's when transfer out of state with the Agreement in (4) civil lawsuits.

40. On about March 5, 2021 - June 7, 2021 Plaintiff's Attorney's Jessica Wegg and Charles Little suppose to have filed a stipulation order by Federal courts to finalize the (4) civil lawsuit on Plaintiff behalf.

41. Plaintiff implemented the (1) man cell, practice his religion, moorish Science Temple of America and no more retaliation from defendants with receiving state "out of state Placement".

42. Plaintiff's Attorney never filed anything on Plaintiff behalf.

43. On or about April 5, 2021 9:00 a.m Plaintiff housed at The Geo Group New Castle Corr. Facility had his family member email Indiana Attorney General Margo Tucker.

44. Plaintiff inform Margo Tucker about his religion "Moorish Science Temple of America", (1) man cell and when was the out of state placement would take place

45. Attorney General Margo Tucker email back to Plaintiff family member inform that she can't talk with or communicate with Plaintiff because he is represented by Atty's. Jessica Wegg / Charles Cittl and have to communicate with-

them.

46. On or about April 15, 2021 Plaintiff email and /or call Atty. Jessica Wegg who answer the phone in a unprofessional tone what? What do you want? I'm bizzy.
47. Plaintiff inform Atty. Ms. Wegg to Please make sure she implement the (1) man cell, practice his religion Moorish Science Temple of America and no more retaliation from defendants
48. Plaintiff inform Atty. Jessica Wegg he can't communicate with Attorney General Mingo Tucker because he is represented by her and Charles Little.
49. Attorney Jessica Wegg then replied "Her boss Mr. Little" is conducting

Mango about these issue's.

50. On or about May 13, 2021 Plaintiff call Attorney Jessica Wegg again to follow up on stipulation he and Atty. Charles Little suppose to file with more issue's dealing with the GeoGroup.

51. Plaintiff inform Attorney Jessica Wegg he wasn't sign nothing until his demand is met with the defendants.

52. Attorney Jessica Wegg then yell at Plaintiff on the phone "My name is on the line and you better sign the paper to settle the (4) lawsuits.

53. Plaintiff then replied " He not sign nothing and he knew the law just as much.

54. On or about MAY 27, 2021 9:00 A.M Plaintiff housed at The Geo Group Private Prison Newcastle Corr. Facility ( Restricted Housing Unit ).
55. Plaintiff met with Asst. Vanderwart and unit Team Shave Nelson sign the Agreement (4) civil lawsuit settlement thinking Attorney's Jessica Wegg / Charles Little fulfill their obligation to Plaintiff by filing the stipulation
56. On or about JUNE 4, 2021 Plaintiff house at TheGeo Group Private Prison New Castle Correctional Facility ( Restricted housing Unit ) encounter Classification Glenda Cecil.
57. Classification Glenda Cecil did a evaluation to determine his needs for X 22 " N. J. D.O.C." And never

implemented to X22 "N. J. D.O.C." that Plaintiff religious preference is M.S.T.A. ( Moorish Science Temple of America) .... Also sign by Unit Team Manager Shave Nelson and Case manager Jama Jones.

58. On or about JUNE 4, 2021 Plaintiff email Attorney Jessica Weig inform her to "STOP trying to inform him his Constitutional Rights, he knew the law just as much she does and she in violation of Indiana Professional Rules of Conduct 1.16(A) Due q owed to her client

59. On or about JUNE 7, 2021 2:30 A.M. Plaintiff housed at The GeoGrap NewCastle Con. Facility (restricted housing unit) was inform by Sgt. Turkey to pack up his property for "X22 "N. J. D. O.C."

60. On or about JUNE 7, 2021 6:30 p.m.  
Plaintiff arrive at Garden State  
Youth Facility prison in Vandville, NJ
61. Plaintiff learn that Attorney's  
Jessica Wegg and Charles Little  
never filed NO STIPULATION on  
Plaintiff behalf for (1) man  
cell; practice his religion  
Moorish Science Temple of America  
NOT AVAILABLE at "X 22 N.J.D.O.C."
62. Plaintiff tried to place Attorney  
Jessica Wegg and Attorney Charles  
Little on his phone list at  
Garden State Youth Facility in  
Vandville, NJ.
63. Attorney's Jessica Wegg and Charles  
Little inform N.J.D.O.C NOT  
to place there numbers on Plaintiff  
Phone list.

- 64 On or about June 1, 2021 8:00 a.m.,  
S.I.T.D. "John Doe" white male  
cell Plaintiff out
65. S.I.T.D. "John Doe" white male had  
the stipulation paper with Atty's  
Jessica Wegg and Mongo Tucker none  
on it.
- 66 Plaintiff inform S.I.T.D. "John Doe"  
white male he need to talk  
with Atty. Jessica Wegg before  
he sign anything.
67. S.I.T.D. "John Doe" white male  
replied "She doesn't want you to  
have her number on your phone list  
and this stipulation was fax  
to me."
68. Plaintiff then replied "Atty's  
Jessica Wegg and Charles Gittle  
never filed any stipulation for

(1) conceal or practice his religion  
moorish Science Temple of America, force  
under duress to sign the stipulation  
with Atty. Jessica Wegg and Atty.  
Mango Tucker more on it.

69. On or about JUNE 22, 2021 Plaintiff  
transfer to Southwood State Prison  
without his property including his  
religious materials.

70. On or about JULY 9, 2021 8:25 A.M.  
Plaintiff filed a JPay inquiry stating  
he been denied his Freedom of  
religion at South wood State Prison

71. On or about JULY 9, 2021 11:35A.M.  
Plaintiff was called out South wood  
State Prison Chaplain Phillip Harden.

72. Plaintiff was inform by chaplain Phillip Harden that he worked for Federal Prison as a chaplain before coming to work for Southwood State Prison as a chaplain.
73. He is very famibr with Moorish Science Temple of America as a religion, it's not common within State of New Jersey and Plaintiff wouldn't be allowed to order a Moorish Science Temple of America Fee or any religious artifacts.
74. Plaintiff then replied " This violate his Freedom of Religion under Religious Land Use and Institutionalized Person Act. (R. L. U. I. P. A.)
75. Plaintiff inform Chaplain Phillip Harden that he been a

Moor since 2002 and have documented to prove in the system within Indiana Dept. of Correction Plaintiff religious preference is Moor (M.S.T.A.).

76. On or about July 9, 2021 Southwood State Prison Chaplain Phillip Horden I emailed East Jersey State Prison Chaplain W. Pidgeon to see if they had a service for Moorish Science Temple of America.
77. On or about July 9, 2021 East Jersey State Prison W. Pidgeon responded "we do not have a Active M.S.T.A. group Active at E.J.S.P. email sent to Southwood State Prison Chaplain Phillip Horden.
78. On or about July 9, 2021 Plaintiff exhausted his state remedies on this subject Denied equal protection

of the law ( R.C.U.I.P.A.)

79. On or about July 21, 2021 - March 16, 2022 Plaintiff was transfer to northern State Prison ( Restricted housing unit), Denied his freedom of Religion, Religious Advisor - Grand Shiek by defendant P. Mogen- Chaplain "John Doe".
80. On or about July 29, 2021 Plaintiff filed a inquiry- Grievance - Appeal to N.J.D.O.C. central office denying Access to practice his religion "moorish Science Temple of America"
81. On or about Oct. 6, 2021 Plaintiff filed a tort claim with Dept. of Treasury on denied to practice his Religion... etc.
82. On or about Oct. 6, 2021 Understetle compact Donna Sweavey wrote Plaintiff stating someone would see Plaintiff about his -

religion beliefs while house at northern state Prison ( restricted housing Unit ).

83. On or about Oct. 6, 2021 northern State Prison Iman come to talk with Plaintiff while housed at northern State Prison ( restricted housing Unit ).
84. Iman explain to Plaintiff there wasnt he could do for him because he was on Restricted housing Unit and have to wait until he is release.
85. Plaintiff explain to Iman that his religion Is different from Sunni or other Muslim here. we believe in the same God, but we have different prophet and different teachings a problem for certain Muslim in N.J.D.C. this is a problem for Plaintiff.

86. Since Plaintiff been within N.J.D.O.C. most Muslim doesn't honor Moorish Science Temple of America as Muslim or the state of Indiana, Illinois, Wisconsin, New York Pa, D.C. Va and so forth does honor Moorish Science Temple of America as Muslim (7<sup>th</sup> Dist. Court).
87. This is the reason why Plaintiff doesn't attend Muslim service at Southwood-State Prison and East Jersey State Prison or when timer come to see other Muslim inmates at Northern State Prison restricted housing unit
88. On or about Oct. 7, 2021 Plaintiff file a Tort claim a second time because Northern State Prison confiscated over \$500.00 in legal copies / legal mail postage that never the prison rec'd (2:21-cv-16842-BRM-CW).

89. Plaintiff never heard nothing back from Dept. of Treasury in Trenton NJ
90. While Plaintiff was housed in Restricted housing unit, his nephew died of a drug overdose, defendant P. Morgan order Plaintiff phone to be shut off August 4, 2021- December 7, 2021 illegally re: Appellant Case pending A. 410.21.TY; A. 811.21.TY and pending lawsuit (2:21-cv-16842-BRM-cw), Plaintiff need a religious Adviser Grand sheik was denied.
91. On or about March 16, 2022 Plaintiff was transfer to East Jersey State Prison
92. On or about April 13, 2022 Plaintiff wrote to head quarters for Moorish Science Temple of America in Chicago, ILL for spiritual guidance on East Coast (NJ, Pa, NY) and denied Freedom of Religion ... etc.
93. On or about April 15, 2022 Plaintiff tried to order religious Artifacts -

Moorish Science Temple of America  
Necklace from George (Auterer  
out of Chicago, IL) that sell  
Masons and Moorish religious  
materials ("George Auterer").

94 On or about April 13, 2022 Plaintiff  
was inform by chaplain at East  
Jersey State Prison W. Pidgeon  
on Jpay that M.S.T.A. (Moorish  
Science Temple of America) not on  
approve list to order religious  
Artifacts ( necklace Fez and etc.)

95. On or about April 14, 2022 Plaintiff  
inform Chaplain W. Pidgeon he  
denying Plaintiff Freedom of Religion  
and denied equal Protection of Law  
on Jpay EJSP 22013995

96 On or about April 14, 2022 East  
Jersey State Prison refuse to process  
order to Carterer for moorish science

Temple of America necklace etc.

97. IV. Relief

98. Wherefore, Plaintiff respectfully prays that this court order defendant's to allow Plaintiff access to Moorish Science Temple of America Religious Advisor Grand Sheikh or seek one on Plaintiff behalf since he new to N.J.D.O.C., order Moorish Science Temple of America religious artifacts (necklace, Fez or any religious artifacts deemed not a security threat to prison) and allow Plaintiff to congregate & hold religious service for other Moorish members AND enter judgement granting Plaintiff.

99. A declaration that the acts and omission described herein

Violated Plaintiff's rights under First Amendment (Freedom of Religion under Religious Land Use And Institutionalized Person Act (R.L.U.-I.P.A.), Freedom of Expression, retaliation for Freedom of Speech, Fourteenth Amendment Denied equal protection inmates similar situated like Plaintiff get to practice there religion beliefs under the Constitution and Laws of the United States

100. A Preliminary Injunction and T.R.O. to stop defendants from retaliation, being in concert with each other to deny Plaintiff his religious belief, Freedom of expression and Freedom of Religion, Allow Plaintiff to purchase religious artifacts (Necklace, Fez or any object that not a security threat to the prison and Stop denying

Access to Religious clergy through  
U.S. Postage Grad Shiek

101 Compensatory damages in the amount of \$ 100,000.00 Against each defendant jointly And Severally.

102. Punitive damages in the amount of 100,000.00 Against each defendant

103. A jury trial on all issues triable by jury

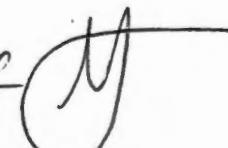
104 Plaintiff lost in this court

105. Any additional relief this court deem just proper And equitable

I declare under penalty of perjury that the foregoing is true and correct 26<sup>th</sup> day of April 2022

Signed this 26<sup>th</sup> day of  
April 2022

Signature of Plaintiff   
Mailing address: East Jersey State  
Prison 7100 Wood Bridge Rd Cook BAG  
R Bayway, NJ 07065  
Telephone number: (732) - 499-5010

Signature of Plaintiff 

ISI Jasper Frazier 799545B